

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

B.P.J. by her next friend and mother, HEATHER JACKSON,

Plaintiff,

v.

WEST VIRGINIA STATE BOARD OF EDUCATION, HARRISON COUNTY BOARD OF EDUCATION, WEST VIRGINIA SECONDARY SCHOOL ACTIVITIES COMMISSION, W. CLAYTON BURCH in his official capacity as State Superintendent, DORA STUTLER in her official capacity as Harrison County Superintendent, and THE STATE OF WEST VIRGINIA,

Defendants,

and

LAINEY ARMISTEAD,

Defendant-Intervenor.

Civil Action No. 2:21-cv-00316

Hon. Joseph R. Goodwin

JOINT MOTION TO FILE EXHIBITS UNDER SEAL

The Parties move this Court for an Order to file Exhibits 1–9 (as designated in the Memorandum of Law in Support of this Motion) under seal and for Plaintiff to file a reference list containing the full name of minor Plaintiff under seal. The Parties submit the attached Memorandum of Law in Support of this Motion, as well as a proposed order.

The Parties have good cause to file Exhibits 1–9 under seal, as these documents contain sensitive personal identifying information, health information, financial information, and other confidential information. The Parties also have a strong and well-recognized right to keep this information private. Under Local Rule 5.2.1, Plaintiff is permitted to file a reference list containing her full name under seal.

The Parties reserve the right to revisit this issue for purposes of determining how to present the subject documents at any future trial.

For these reasons, the Parties respectfully ask the Court to enter an Order permitting the Parties to file Exhibits 1–9 under seal and to permit Plaintiff to file the reference list under seal.

Dated: April 21, 2022

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CERTIFICATE OF SERVICE

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I, Loree Stark, do hereby certify that on this 21st day of April, 2022, I electronically filed a true and exact copy of the ***Joint Motion to File Exhibits Under Seal*** with the Clerk of Court and all parties using the CM/ECF System.

/s/ Loree Stark

Loree Stark

West Virginia Bar No. 12936